

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN DAUBERT,	:	CIVIL ACTION
Plaintiff	:	
	:	
v.	:	NO.
	:	
NRA GROUP, LLC d/b/a	:	
NATIONAL RECOVERY AGENCY,	:	
Defendant	:	JURY TRIAL DEMANDED

**NOTICE OF REMOVAL**

Defendant NRA GROUP, LLC d/b/a NATIONAL RECOVERY AGENCY  
("NRA" and/or "Defendant"), by its undersigned counsel, hereby petitions this  
Court as follows, pursuant to 28 U.S.C. § 1441(a):

1. NRA is a defendant in an action pending in the Commonwealth of  
Pennsylvania, Court of Common Pleas of Luzerne County, Civil Action, Case No.  
2015-01734 ("the State Court Action"). A true and correct copy of the Complaint  
in the State Court Action is attached hereto as Exhibit "A".

2. Plaintiff in the State Court Action is JOHN DAUBERT ("Plaintiff").  
See Exhibit "A".

3. Plaintiff's State Court Action alleges violations of the Fair Debt  
Collection Practices Act, 15 U.S.C. § 1692, et seq.

4. The State Court Action involves a question of federal law. Pursuant  
to 28 U.S.C. § 1331, "The district courts shall have original jurisdiction of all civil  
actions arising under the Constitution, laws, or treaties of the United States."

5. Pursuant to 28 U.S.C. § 1441(a), “[a]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.”

6. Since this case arises out of an alleged violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq., Defendant may properly remove the State Court Action based on 28 U.S.C. § 1441(a).

7. This Notice has been filed with the Court within thirty (30) days after purported service of the Complaint on Defendant.

WHEREFORE, Defendant NRA Group, LLC d/b/a National Recovery Agency prays that the State Court Action be removed from the Commonwealth of Pennsylvania, Court of Common Pleas of Luzerne County, Civil Action, Case No. 2015-01734, to this Court for proper and just determination.

FINEMAN KREKSTEIN & HARRIS, P.C.

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Attorneys for Defendant

Dated: April 13, 2015

### **CERTIFICATE OF SERVICE**

I, RICHARD J. PERR, ESQUIRE, hereby certify that on or about this date, I served a true and correct copy of the foregoing electronically, or by first class mail, postage prepaid, or telecopy on the following:

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Attorneys for Plaintiff

/S/ Richard J. Perr

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RICHARD J. PERR, ESQUIRE

Dated: April 13, 2015